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   SARA NEWSOME BURNS

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9 **UNITED STATES BANKRUPTCY COURT**

10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 In Re:)   **CASE NO. 99-33191-B7**
)
12 **SARA NEWSOME BURNS**, an individual,   )   **MOTION TO AVOID JUDICIAL LIEN**
)   **PURSUANT TO 11 U.S.C. § 522(f)**
13   Debtor.   )
)
14   )   Date: 1/31/00
)   Time: 10:30 a.m.
15   )   Dept: Four (4)
)
16   )
)
17 _____)

18   NOTICE IS HEREBY GIVEN THAT, as reflected in the Notice of Intended Action And

19 Opportunity For Hearing filed and served herewith, pursuant to 11 U.S.C. §522(f) and Federal Rules

20 of Bankruptcy Procedure Rules 4003(d) & 9014, Debtor, Sara Newsome Burns, has moved this Court

21 for an order avoiding the fixing of the judicial lien of Bradley L. Proulx recorded in the Office of the

22 County Recorder for the County of San Diego on November 6, 1998 as Recorder's File No. 98-

23 0725547, on the real property residence owned by the Debtor located at 4621 & 4623 Kensington

24 Drive in San Diego, California.

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The Motion To Avoid Judicial Lien is made on the grounds that the judicial lien impairs the Debtor's homestead declaration filed on this residence on October 2, 1998, as Recorder's File No. 98-0634852. The motion will be based upon this Notice, the Notice of Intended Action And Opportunity For Hearing, the Memorandum of Points and Authorities In Support of Motion To Avoid Judicial Lien and the Declaration of Sara Newsome Burns, all of which are filed and served herewith.

Dated: 12-23-99

ROBBINS & KEEHN
A Professional Corporation

By: _____
L. Scott Keehn
Lisa L. Keehn
Attorneys for Debtor, **SARA NEWSOME BURNS**

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